

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,
Plaintiff,

No. CV-22-08196-PCT-MTL

vs.

**DECLARATION OF
PINNY SHEORAN**

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,

Defendants.

I, Pinny Sheoran, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters stated in this Declaration.
2. I live in Scottsdale, Arizona and have lived and voted in Arizona since 1990.
3. I have been a member of the League of Women Voters of Arizona (hereafter "League") for over 6 years, and I am currently president of the League, having been elected president in 2022.
4. The League is a domestic not for profit corporation, duly registered in accordance with Arizona law.
5. The League is an affiliate of the League of Women Voters of the United States.
6. The League dedicates its efforts to protecting and promoting the democratic process of government through public service, civic participation, and robust voter education and registration.
7. The League consists of both a statewide organization and five local chapters with 900 members statewide, and 90 percent of our members use early voting, including mail-in and drop box voting.

- 1 8. The League educates voters about upcoming elections, including the dates and
2 deadlines for early in-person and mail-in voting, as well as the availability of drop
3 box voting in the state. The League also works to encourage individuals to vote;
4 and participates in statewide coalitions with other organizations that share similar
5 goals.
- 6 9. The League envisions a democracy where every person has the desire, the right,
7 the knowledge, and the confidence to participate.
- 8 10. To achieve this mission, the League uses many tools. League volunteers typically
9 help tens of thousands of citizens in Arizona register to vote, check their
10 registration status, update their information, and navigate the system of early in-
11 person and mail-in voting. Throughout the COVID-19 pandemic, the League has
12 provided Arizona citizens with vital voting information through online platforms
13 like VOTE411.org and printed materials, including voter guides. The League
14 continues to encourage Arizona voters to cast their ballot via the mechanism that
15 is safest and most convenient for them, using any of the available early voting
16 options that have been available for decades in Arizona and any of the options to
17 apply for and return a ballot.
- 18 11. The League's mission of educating voters and encouraging them to vote has been
19 directly frustrated by Defendants' actions. Voter surveillance, intimidation, and
20 harassment sharply curtails citizens' willingness to participate in the democratic
21 process and thereby impedes the League's mission. In fact, League members have
22 been directly impacted by drop box intimidation. Voters and League members rely
23 on drop box voting throughout Arizona. But many League members who have
24 voted using drop boxes in the past will no longer use that method for the 2022
25 general election due to surveillance, intimidation, and harassment by Defendants.
26 Drop boxes are particularly important in rural areas such as Yavapai County where
27 mail is less reliable.
- 28

1 12. Because voter intimidation is a vital issue of concern to League members and the
2 public, the League has diverted money, time, and other resources from its core
3 mission of registering voters, encouraging voter participation, and educating
4 voters on ballot initiatives to address Defendants' intimidation tactics.

5 13. The League allocated funds to hire five paid interns to assist with communications
6 efforts, outreach to voters, and management of social media messaging. These
7 communication efforts typically detail voting deadlines and provide information
8 on what measures will be on the upcoming ballot.

9 14. In the wake of the evolving crisis over drop box surveillance, the League has had
10 to divert about 50% of the work of those paid interns towards preparing and
11 communicating to voters to ensure voters know of their rights, including the right
12 to vote without intimidation.

13 15. For example, the League was planning to send out a newsletter to its members in
14 order to get volunteers to help with get out the vote efforts. The League, however,
15 was forced to divert its resources to a newsletter to address the threat of voter
16 intimidation in Arizona. Specifically, the newsletter now advises members on the
17 definition of voter intimidation and what members should do if a member is
18 intimidated at a drop box.

19 16. In addition, the League has also had to expend roughly \$2,000 to send text
20 messages to its list of more than 200,000 women voters advising them of their
21 rights related to voter intimidation

22 17. The League has also had to divert its phone banking efforts. The League originally
23 planned to spend money to make calls to voters about upcoming deadlines and to
24 advise them of the initiatives that will be on the ballot. Because of the voter
25 intimidation occurring at drop boxes, this messaging has also been diverted to
26 advising members of safer locations—for example, inside a county building—to
27 drop off their ballots.
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1 18. League members in Yavapai County also have had to educate voters who were too
2 afraid to vote at drop box locations due to concerns about security and invasion of
3 privacy.

4 19. The League has also diverted valuable time and efforts of staff and volunteers to
5 developing protocols for tracking misconduct by drop box vigilantes.

6 20. Lastly, senior staff of the League have had to adjust their focus from traditional
7 voter mobilization efforts to respond to the drop box vigilante crisis as members
8 have had increasing concerns about drop box intimidation.

9 I declare under penalty of perjury that the foregoing Declaration is true and correct.

10 Executed on October 28, 2022.

11 DocuSigned by:
12 *Pinny Sheoran*
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14 Pinny Sheoran
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